

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS MURPHY,  
MG FREESITES, LTD., D/B/A  
PORNHUB.COM, and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**CONSENT MOTION IN SUPPORT  
OF PRO HAC VICE ADMISSION**

The undersigned local counsel hereby moves, together with the Application and Affidavit attached as Exhibit A, that Sean Taheri of the law firm Quinn Emanuel Urquhart & Knupp, LLP be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted pro hac vice; and

4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion:  will likely oppose;  does not intend to oppose

Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

No duty of consultation is required because the opposing party is proceeding pro se.

Respectfully submitted,

DATED May 22, 2024

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,  
P.A.

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